

FILED
CLERK

1:20 pm, Apr 20, 2020

ALB:OG

U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
LONG ISLAND OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. §§ 2251(a))

ROBERT ADAMS,

20MJ314(SIL)

Defendant.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

CINDY WOLFF, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about April 2020, within the Eastern District of New York and elsewhere, the defendant ROBERT ADAMS, did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported or transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, which visual depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which visual depictions were transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Section 2251(a))

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), assigned to the Long Island Human Trafficking and Child Exploitation Task Force. I have participated in numerous investigations involving the exploitation of children and the distribution, creation, receipt, and possession of child pornography. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. In or about April 2020, the FBI obtained information regarding the trading of child pornography on an internet web site, called Kik. From on or about April 15, 2020 until April 16, 2020, a law enforcement officer acting in an undercover capacity had conversations with the user of the DOE ACCOUNT, an online Kik account the identity of which is known to the FBI, and subsequently identified as the defendant ROBERT ADAMS. The conversations were in a Kik group, via private message and in a group chat with another Kik user. During these conversations, ADAMS indicated that he was "active" (which I know a term to be used to suggest sexual activity) with two girls, a one-year-old and an eight-year-old whom he identified by relationship to him. ADAMS sent several pictures which he purported to be of himself and the two girls. ADAMS advised the undercover that he saw the eight-year-old on a regular basis and touched her mostly while she was sleeping,

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

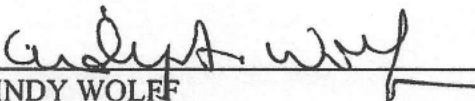
but when she was awake as well. ADAMS also advised that he had previously taken “naughty” pictures of both girls and referred to sexual acts he performed on the one-year-old, using the terms “rubbed,” “touched” and “tasted” when describing what he had done.

3. On or about April 16, 2020, ROBERT ADAMS distributed an image of child pornography to the FBI undercover. I have reviewed that file, which depicts a prepubescent female that appears to be under three years of age, laying down with her legs spread and her naked vagina visible. The hand of what appears to be an adult male is covering the lower part of her body with the thumb on her vagina.

4. After determining that the DOE ACCOUNT was associated with an email address linked to the defendant ROBERT ADAMS and linking the Kik IP address to the residence of ADAMS in North Babylon, New York, on April 19, 2020, task force officers and agents executed a search warrant at the residence authorized by United States Magistrate Judge A. Kathleen Tomlinson. That warrant authorized the search for evidence of child pornography in violation of Title 18, United States Code, Sections 2251, 2252 and 2252A.

5. Contemporaneous with the search, on or about April 19, 2020, I interviewed the defendant ROBERT ADAMS, following waiver of his Miranda rights, who was present at the residence. Among other things, the defendant ROBERT ADAMS admitted to being the user of the DOE ACCOUNT on the Kik messenger application and admitted to taking and sending the child pornography image that was received by the FBI undercover on April 16, 2020 that was described above. The defendant also admitted that the picture depicted the one-year-old whom he had discussed in the chat with the undercover.

WHEREFORE, your deponent respectfully requests that the defendant
ROBERT ADAMS, be dealt with according to law.


CINDY WOLFF
Special Agent, Federal Bureau of Investigation

Sworn to before me this
20th day of April, 2020



THE HONORABLE STEVEN I. LOCKE
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK